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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 07-00698-MMC
Plaintiff,)	
v.)	STIPULATION AND [PROPOSED]
)	PROTECTIVE ORDER UNDER FED. R.
ALIREZA RAHMANI,)	CRIM. P. 16
Defendant.)	
)	

On April 9, 2008, the parties in this case appeared before the Court and addressed the need for the following protective order. After that hearing, at which both parties were heard, the Court issues the following Protective Order, to which both parties have stipulated.

PROTECTED MATERIAL

The government has provided defense counsel with redacted portions of two digital images. Those documents are bates-labeled USA-000109 and USA-000110, and are the

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1 “Protected Material.” Pending the issuance of this Order, defense counsel agreed not to
2 disseminate the Protected Material to any person outside its law firm.

3 **PROTECTIVE ORDER**

4 Pursuant to Federal Rule of Criminal Procedure 16, good cause exists for entry of a
5 protective order for the above-described documents and disclosure of these materials shall be
6 subject to the following restrictions:

7 **1. Protected Material**

8 Possession of copies of the Protected Material is limited to: (1) attorneys for defendant
9 Alireza Rahmani, specifically Robert Beles, Annie Beles, Jamil Karwash, and other attorneys at
10 the Law Office of Robert Beles law firm; and (2) their respective investigators, experts, and
11 paralegals. Those people are collectively referred to as the "Defense Team."

12 The Defense Team shall not provide copies of the Protected Material to any other
13 person, shall not duplicate the Protected Material, and shall not disseminate any copies of the
14 Protected Material to any other person. The Defense Team may show the Protected Material
15 only to the defendant and only in conjunction with their defense of him in this case. At no time
16 will any copies of the Protected Material be left in the custody of the defendant or any other
17 person. The Defense Team is prohibited from using the Protected Material for any purpose other
18 than defending the defendant in this case

19 Further, the defendant's attorneys shall, prior to disseminating any copies of the
20 Protected Material to other members of the Defense Team, review this Order and provide a copy
21 of this Order to each member of the defense team.

22 This Order shall be binding on all subsequent attorneys who represent the defendant in
23 this case and on any other person who becomes a member of the Defense Team or comes into
24 possession of Protected Material.

2. Non-termination

The provisions of this Order shall not terminate at the conclusion of this prosecution but only upon further order of this Court.

SO STIPULATED:

JOSEPH P. RUSSONIELLO
United States Attorney

DATED: April 21, 2008

/s/
TAREK J. HELOU
Assistant United States Attorney

DATED: April 21, 2008

/s/
ANNIE BELES
Attorney for Defendant Alireza Rahmani

SO ORDERED.

DATED: _____

THE HONORABLE MAXINE M. CHESNEY
United States District Judge